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*Attorneys for the State of Oregon*

**UNITED STATES DISTRICT COURT**  
**DISTRICT OF OREGON**  
**EUGENE DIVISION**

**STATE OF OREGON**

**6:23-CR-00330-MC**

**vs.**

**STATE'S WITNESS LIST**

**SAMUEL TROY LANDIS,**

**Defendant.**

The State of Oregon hereby gives notice that it intends to call some or all of the following witnesses during the Motion to Dismiss hearing scheduled for November 25, 2024. The estimated time listed for each witness is for direct examination only.

**Officer Martin Powell.** Officer Powell is a Police Officer with the Keizer Police Department. Officer Powell is expected to appear in person. Officer Powell will testify to his role in the crash re-construction, analysis of the video, calculations of speed, and visibility in the area. His testimony is expected to take 45 minutes.

**Rachel Wood.** Ms. Wood is a resident near the scene of the crash. Ms. Wood is expected to appear in person and will testify to her observations on the day of the crash, her knowledge of the danger of the intersection where the crash occurred, and her prior observations of Ms. Allen's riding in the area. Her testimony is expected to take 15 minutes.

**Special Agent Andrew Phelps.** Agent Phelps is currently employed with the Oregon State Department of Justice. Special Agent Phelps is expected to appear in person. Special Agent Phelps will testify to the timing of events as established by 911 recordings, collection of video evidence, and the responses he received to defendant's written question responses. His testimony is expected to take 30 minutes.

**Mitchell Mason.** Mr. Mason is retired from the Salem Police Department. Mr. Mason will testify to his role in the accident reconstruction. His testimony is expected to take 15 minutes.

**Officer Kevin McCarley.** Officer McCarley is currently employed with the Salem Police Department. Officer McCarley is expected to testify in person. Officer McCarley will testify to the nature of the investigation, his role in the investigation, his observations at the crash scene, his knowledge of the investigation was at the time of the crash, and the lack of exigent circumstances or urgency during this investigation. His testimony is expected to take 30 minutes.

**Detective Eugene Zuniga.** Detective Zuniga is currently employed with the Salem Police Department. Detective Zuniga is expected to testify in person. Detective Zuniga is

expected to testify to his role in the investigation including where he was at the time of the crash and risks involved in surveillance. His testimony is expected to take 30 minutes.

**Sergeant Vince Dawson.** Sergeant Dawson is currently employed with the Salem Police Department. Sergeant Dawson is expected to testify in person. Sergeant Dawson is expected to testify to his role in the investigation and his knowledge of the investigation at the time of the crash. His testimony is expected to take 30 minutes.

**Special Agent Todd Hoagland.** Special Agent Hoagland is employed with the Drug Enforcement Agency. Special Agent Hoagland is expected to testify in person. Special Agent Hoagland is expected to testify to his role in the investigation, where he was located when the crash occurred, his observations of the area of the crash, and his knowledge of the risks involved in surveillance. His testimony is expected to take 30 minutes.

**Special Agent Adam Otte.** Special Agent Otte is employed with the Drug Enforcement Agency. Special Agent Otte is expected to testify in person. Special Agent Otte is expected to testify to his role in the investigation, where he was located when the crash occurred, his observations of the area of the crash, and the lack of exigent circumstances or urgency during this investigation. His testimony is expected to take 30 minutes.

**Special Agent Jeff Thomas.** Special Agent Thomas is employed with the Drug Enforcement Agency. Special Agent Thomas is expected to testify in person. Special Agent

Thomas is expected to testify to his role in the investigation, where he was at the time of the crash, and the lack of exigent circumstances or urgency during this investigation. His testimony is expected to take 30 minutes.

Dated: November 18, 2024

Respectfully Submitted,  
PAIGE E. CLARKSON  
Marion County District Attorney

s/ David R. Wilson  
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